UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA NEW ALBANY DIVISION

In re:) Chapter 11	
)	11
EASTERN LIVESTOCK CO., LLC,) Case No. 10-93904-BHL	J-11
)	
Debtor.)	

AFFIDAVIT OF JAMES A. KNAUER, TRUSTEE AS SUPPLEMENTAL RULE 2014 DISCLOSURE

James A. Knauer, under penalties of perjury, says:

- 1. I am an attorney admitted to practice before the United States District Court for the Southern District of Indiana and am a partner in the law firm of Kroger, Gardis and Regas, LLP ("KGR") located at 111 Monument Circle, Suite 900, Indianapolis, Indiana 46204-5125. This affidavit is submitted as an additional disclosure pursuant to Bankruptcy Rule 2014.
- 2. I have reviewed the "Trustee's Response To Motions To Remove The Trustee" ("Trustee Response"). I have personal knowledge and have reviewed the records of KGR with regard to the truth and accuracy of facts set forth in footnote 12 on page 5 and pages 12 through to the "Conclusion" on page 13 of the Trustee Response. The facts set forth therein are true and accurate to the best of my knowledge, information and belief.
- 3. My appointment as the Trustee for the estate of Eastern Livestock Co., LLC ("ELC") in above captioned case ("Chapter 11 Case") was approved by order of the United States Bankruptcy Court for the Southern District of Indiana ("Court") on December 27, 2010 [Docket No. 102], and I have served continuously since.
 - 4. KGR has never represented Wells Fargo Business Credit, Inc.

- 5. KGR represented Wells Fargo Bank, N.A. ("WFB") in matters related to the "Lauth Cases" under cause numbers 09-06067, 09-06066, 09-06065, Adv. 11-50118 in the United States Bankruptcy Court for the Southern District of Indiana, New Albany Division and USDC Southern District of Indiana case numbers 1:09-CV-00746, 00957 and 00958. I served as local counsel to Sidley Austin, LLP in this representation. That representation concluded on April 17, 2012.
- 6. The representation of WFB identified in paragraph 5 of this affidavit, is the only representation of any Wells Fargo affiliate by KGR or me in the past three years.
- 7. Revenues from Wells Fargo in 2010 were less than 1.5% of KGR's gross income and less than 1% of KGR's gross revenue in 2011.
- 8. For the avoidance of doubt, KGR further discloses that it has been engaged by one or more special servicers on behalf of certain special purpose vehicles identified as "Trusts". The Trusts issue mortgage pass through certificates to investors. A national bank is typically the Trustee of each trust. KGR has represented such Trusts in a variety of foreclosure actions. Over the past 3 years, in 8 such actions, WFB served as the Trustee for the client Trust. KGR's client in each case is the trust, not WFB. KGR was paid independently by each special servicer out of its revenues and received no fees from the Trusts or WFB as the Trustee. In none of these cases has KGR ever had any contact with Wells Fargo.

I affirm, under the penalties of perjury, the foregoing statements are true.

Executed this 13th day of August 2012.

lames A. Knauer